

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

OLURO OLUKAYODE,)
) CA No. 0:19-cv-01101-DSD-HB
Plaintiff,)
)
v.)
)
UNITEDHEALTH GROUP,)
OPTUM, INC. and)
THE ADVISORY BOARD COMPANY,)
)
Defendants.)
_____)

LINUS KPADUWA, MARK DOIG,)
PASCHAL EMELUE, STEPHANIE WALL,)
TAMARA HUTTON, ERAM ZAIDI,)
JENNY UZOUKWU, CHRISTY RIVERA,)
DAVEY WRIGHT, KERRIN SOJOURNER,)
CHARLOTTE KENNEDY,)
VALERIE THORNTON,)
EJIKE ACHUMBA, JIMMY AJUWA,)
MARC NADREAU and FOLAKEMI)
OREDEKO,)
)
) CA No. 21-cv-01991-DSD-JFD
Plaintiffs,)
)
v.)
)
UNITEDHEALTH GROUP,)
OPTUM, INC. and)
THE ADVISORY BOARD COMPANY,)
)
Defendants.)
_____)

**PLAINTIFFS' UNOPPOSED MOTION FOR
APPROVAL OF FLSA SETTLEMENT**

Plaintiffs Oluro Olukayode, Linus Kpaduwa, Mark Doig, Paschal Emelue, Stephanie Wall, Tamara Hutton, Eram Zaidi, Jenny Uzoukwu, Christy Rivera, Davey Wright, Kerrin Sojourner, Charlotte Kennedy, Valerie Thornton, Ejike Achumba, Jimmy Ajuwa, Marc Nadreau and Folakemi Oredeko (“Plaintiffs”) hereby respectfully request the Court’s approval of the settlement reached by the Plaintiffs and Defendants UnitedHealth Group, Optum, Inc. and The Advisory Board Company (“Defendants”). This Settlement resolves the claims of the Plaintiffs and opt-ins under the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* (“FLSA”) and Maryland, Maine and New York state law for a total of \$192,500.00, including a net settlement amount of \$70,000.00, and attorneys’ fees in the amount of \$122,500.00, and is the result of two settlement conferences before Magistrate Judge Docherty. As detailed in the accompanying Memorandum of Law, this proposed resolution of the Plaintiffs’ claims is fair and reasonable and warrants judicial approval. Plaintiffs respectfully request that the Court issue an order: 1) granting approval of the proposed Settlement Agreement and allocation; and 2) approving the award of attorneys’ fees and costs in the amount of \$122,500.00.

Dated: April 20, 2022

Respectfully submitted,

/s/Olena Savytska
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